

EXHIBIT 16

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

--oOo--

ENVIRONMENTAL WORLD WATCH,)
INC., in the public interest,)
)
Plaintiff,)

vs.)

No. BC 337618
(Lead Case)

THE PROCTER & GAMBLE)
DISTRIBUTING COMPANY et al.,)
)
Defendants.)

**CERTIFIED
COPY**

) No. BC 280980
AND RELATED ACTIONS.) No. BC 338956
)

VIDEOTAPED DEPOSITION OF
MARTHA SANDY, Ph.D.

Wednesday, May 2, 2007
Volume II (Pages 167 - 224)

REPORTED BY: CYNTHIA A. PACINI, CSR #6117, RMR, CRR
(01-395147)

M E R R I L L L E G A L S O L U T I O N S

1	I N D E X		
2	INDEX OF EXAMINATIONS		
3			Page
4	EXAMINATION BY MR. HAINLINE (Resumed).....		172
5	EXAMINATION BY MR. WEIL		213
6	EXAMINATION BY MR. METZGER		218
7			
8	EXHIBITS MARKED FOR IDENTIFICATION		
9	No.	Description	Page
10			
11	(No Exhibits Marked.)		
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

--o0o--

Videotaped deposition of MARTHA SANDY,
Ph.D. taken by the Defendants at the Office of the
Attorney General, 1515 Clay Street, Oakland,
California, commencing at 9:13 a.m. on Wednesday,
May 2, 2007, before me, Cynthia A. Pacini, a
Certified Shorthand Reporter, Registered Merit
Reporter and Certified Realtime Reporter, pursuant
to Notice and Subpoena.

--oOo--
A P P E A R A N C E S
FOR THE OFFICE OF ENVIRONMENTAL HEALTH HAZARD
ASSESSMENT:

STATE OF CALIFORNIA
DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
1515 Clay Street
P.O. Box 70550
Oakland, California 94612-0550
(510) 622-2149
By: EDWARD G. WEIL,
Deputy Attorney General

19 LAURA J. ZUCKERMAN,
Deputy Attorney General

21 OFFICE OF ENVIRONMENTAL HEALTH HAZARD
ASSESSMENT LEGAL OFFICE
1001 I Street
22 P.O. Box 4010
Sacramento, California 95812
23 (916) 322-0493
By: CAROL J. MONAHAN-CUMMINGS,
24 Chief Counsel

1 A P P E A R A N C E S (Continued)
2 FOR THE PLAINTIFF COUNCIL FOR EDUCATION AND RESEARCH
3 ON TOXICS:

4 METZGER LAW GROUP
5 401 East Ocean Boulevard, Suite 800
6 Los Angeles, California 90802
7 (213) 892-5005
8 By: RAPHAEL METZGER, Attorney at Law
9 (Present via telephone)

10 FOR THE DEFENDANT McDONALD'S CORPORATION:
11 GOODWIN PROCTER, LLP
12 101 California Street
13 San Francisco, California 94111
14 (415) 733-6000
15 By: FORREST A. HAINLINE, III,
16 Attorney at Law

17 FOR THE DEFENDANT McDONALD'S CORPORATION:
18 SONNENSCHNEIN, NATH & ROSENTHAL, LLP
19 601 South Figueroa Street, Suite 1500
20 Los Angeles, California 90017
21 (213) 892-5005
22 By: GARY M. ROBERTS, Attorney at Law

23 FOR THE DEFENDANT KETTLE FOODS, INC.:
24 BARG, COFFIN, LEWIS & TRAPP, LLP
25 One Market, Steuart Tower, Suite 2700
San Francisco, California 94105-1475
(415) 228-5400
By: BRETT S. HENRIKSON, Attorney at Law

FOR THE DEFENDANT PROCTER & GAMBLE MANUFACTURING
COMPANY and THE PROCTER & GAMBLE DISTRIBUTING
COMPANY:

ORRICK, HERRINGTON & SUTCLIFFE, LLP
400 Capitol Mall, Suite 3000
Sacramento, California 95814-4497
(916) 329-4981
By: JOHN M. MURRAY, Attorney at Law

1 A P P E A R A N C E S (Continued)
2 FOR THE DEFENDANT FRITO-LAY, INC.
3 BINGHAM McCUTCHEN, LLP
Three Embarcadero Center
4 San Francisco, California 94111-4067
(415) 393-2520
5 By: TODD O. EDMISTER, Attorney at Law
6
7 FOR THE DEFENDANT BURGER KING CORPORATION, H.J.
HEINZ COMPANY; LANCE, INC.; WENDY'S INTERNATIONAL,
8 INC.:
9 MORRISON & FOERSTER, LLP
425 Market Street
10 San Francisco, California 94105-2482
(415) 268-7339
11 By: BROOKS M. BEARD, Attorney at Law
ROBIN STAFFORD, of Counsel
12
13
14 Also Present: TED HOPPE - Videographer
15 --oOo--
16
17

09:00:56 18
09:02:56 19
09:02:56 20
09:02:56 21
09:02:56 22
09:02:56 23
09:02:56 24
09:02:56 25

09:16:59 1 The National Toxicology Program considers
09:17:03 2 acrylamide as reasonably anticipated to be a human
09:17:05 3 carcinogen. And I believe OEHHA would agree with
09:17:10 4 that statement.

09:17:12 5 MR. HAINLINE: Q. All right.

09:17:13 6 A. Other authoritative bodies have made
09:17:15 7 similar conclusions, slightly different phraseology.
09:17:20 8 The International Agency for Research on Cancer and
09:17:22 9 the U.S. Environmental Protection Agency, they
09:17:26 10 consider acrylamide as a probable human carcinogen.

09:17:30 11 Q. Okay. Yesterday, if you recall, I asked
09:17:32 12 you whether any health organization, any
09:17:36 13 governmental health organization, in the world has
09:17:39 14 listed acrylamide as a known human carcinogen.

09:17:42 15 Do you recall that question?

09:17:43 16 A. Yes.

09:17:43 17 Q. And you answered no. Do you recall that?

09:17:45 18 A. That's correct.

09:17:46 19 Q. My question now -- I appreciate what you
09:17:50 20 wrote in Sandy 1 -- is whether -- is, does OEHHA
09:17:57 21 know whether acrylamide is a human carcinogen?

09:18:00 22 And I'd appreciate it if you would answer
09:18:02 23 "yes," "no" or "I don't know."

09:18:07 24 MR. METZGER: Same objections.

09:18:09 25 THE WITNESS: No.

CERTIFICATE OF REPORTER

I, CYNTHIA A. PACINI, a Certified Shorthand Reporter, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth and nothing but the truth in the within-entitled cause;

That said deposition was taken down in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by computer, under my direction and supervision;

I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

DATED: May 11, 2007

Cynthia A. Pacini

CYNTHIA A. PACINI, CSR No. 6117

Changes to Deposition of Martha Sandy, May 1-2, 2007
Environmental World Watch v. Procter & Gamble Distribution Company
(L.A. Sup. Ct. No. BC 337618), and related actions.

Page 30, line 16: Delete "0.1"; insert "1.0."

Page 29, lines 15-16: Insert "." after "tumors"; change "in" to "In"; insert "," after "et al."

Page 40, line 2: Delete "a"; insert "hormonal".

Page 45, line 7: Delete "Rowell" insert "Rao."

Page 57, line 17: Delete "added" insert "multiplied".

Page 58, line 16: Delete "adding"; insert "multiplying"; delete "sum" insert "product".

Page 65, line 24: Delete "from"; insert "in".

Page 65, line 25: Delete "pharmacodynamic" insert "pharmacokinetic".

Page 117, line 15: Delete "Croik" insert "Krowech".

Page 127, line 2: Delete "add"; insert "multiply".

Page 128, line 4: Delete "mean" and insert "median" in both instances (otherwise the answer would be "incorrect.")

Page 130, line 22: Delete "2003" and insert "October 2002" ; before "2004" insert "April."

Page 137, line 23: Delete "McColfgal" insert "Moolgavkar".

Page 144, line 18: Delete "world"; insert "word".

Page 152, line 14: Delete "AGE"; insert "AH".

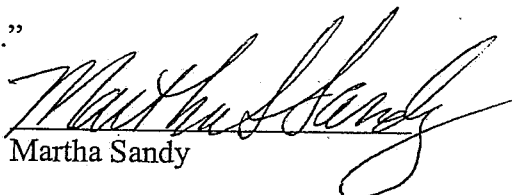
Page 163, line 3: Delete "Osheda"; insert "Oshita".

Page 183, line 15: Delete "toxicogenetics"; insert "toxicokinetics".

Page 214, line 22: Delete "four"; insert "two".

Page 214, line 24: Delete "0.25"; insert "0.5."

Dated: June 8, 2007


Martha Sandy

Case Name: *Environmental World Watch v. Procter & Gamble*

Case No.: Los Angeles County Superior Court NO. BC338956 (Lead Case)

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On June 8, 2007, I served the attached **CHANGE'S TO THE DEPOSITION OF MARTHA SANDY (May 1-2, 2007)** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the internal mail collection system at the Office of the Attorney General at P.O. Box 70550, Oakland, CA 94612-0550, addressed as follows:

Trenton H. Norris, Esq.
Todd O. Edmister, Esq.
Gabriel J. Padilla, Esq.
Bingham McCutchen LLP
Three Embarcadero Center
San Francisco, CA 94111-4067
Attorneys for Frito-Lay, Inc.

Forrest A. Hainline III
Robert B. Bader
Goodwin Procter LLP
101 California Street
San Francisco, CA 94111
Attorneys for McDonald's Corporation

Michèle B. Corash, Esq.
Brooks M. Beard, Esq.
Robin S. Stafford, Esq.
Morrison & Foerster LLP
425 Market Street
San Francisco, CA 94105-2482
*Attorneys for Burger King Corporation
H.J. Heinz Company; Lance, Inc.; Wendy's
International, Inc., and Kettle Foods, Inc.*

Raphael Metzger, Esq.
Metzger Law Group
401 East Ocean Blvd., Suite 800
Los Angeles, CA 90802

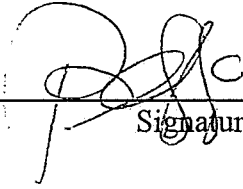
Norman C. Hile, Esq.
John Murray, Esq.
Mike Week, Esq.
Orrick, Herrington & Sutcliffe LLP
400 Capitol Mall, Suite 3000
Sacramento, CA 95814-4497
*Attorneys for The Procter & Gamble
Manufacturing Company and
The Procter & Gamble Distributing Company*

Gary M. Roberts, Esq.
John E. Walker, Esq.
Jennifer Yu Sacro, Esq.
Sonnenschein Nath & Rosenthal LLP
601 S. Figueroa Street, Suite 2500
Los Angeles, CA 90017-5704
Attorneys for McDonald's Corporation

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on June 8, 2007, at Oakland, California.

Rosaura M. Altamirano

Declarant



Signature

90063052.wpd